

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES
EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

BMW MANUFACTURING CO., LLC,

Defendant.

CIVIL ACTION NO.
7:13-CV-01583-HMH-JDA

PLAINTIFF EEOC'S SECOND MOTION FOR A PROTECTIVE ORDER

Plaintiff United States Equal Employment Opportunity Commission (the "EEOC") files this second motion for a protective order pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure. In support of this motion, the EEOC shows unto the Court the following:

1. On March 30, 2015, Defendant BMW Manufacturing Co., LLC ("Defendant") took the Rule 30(b)(6) deposition of the EEOC. During the Rule 30(b)(6) deposition, the EEOC objected to a number of Defendant's questions on the grounds that they sought information that was protected by the deliberative process privilege and the attorney work product doctrine.

2. The parties discussed the EEOC's objections pursuant to Local Rule 7.02 on April 2, 2015 and at that time agreed that the deadline for the EEOC's second motion for a protective order would be April 16, 2015. The parties again conferred on April 7, 2015 and April 15, 2015. The EEOC is filing the instant motion seeking a protective order with respect to seven questions that seek information subject to the governmental deliberative process privilege and thirteen questions that seek information subject to the attorney work product doctrine.

3. The EEOC is submitting a memorandum of law with exhibits in support of its motion for a protective order. Several of the exhibits to the EEOC's memorandum are the subject of a motion to seal that is being filed contemporaneously herewith

Respectfully submitted, this the 15th day of April, 2015.

UNITED STATES EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

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